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March 20, 2017

Gerald Fries
Thomas Lee Stanley
Action Auto Dismantlers
151 Reed Ct
Chula Vista California 91911

VIA CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Thomas Lee Stanley
Action Auto Dismantlers Inc
151 Reed Ct
Chula Vista California 91911



Re: Clean Water Act Notice of Intent to Sue/60-Day Notice Letter
Action Auto Dismantlers Inc Violations of General Industrial Permit

Dear Mr. Fries:

Please accept this letter on behalf of the Coastal Environmental Rights Foundation (CERF) regarding Action Auto Dismantlers, Inc ("Action Auto")'s violations of the State Water Resources Control Board Water Quality Order Nos. 97-03-DWQ and 2014-0057-DWQ, Natural Pollutant Discharge Elimination System (NPDES), General Permit No. CAS000001, and Waste Discharge Requirements for Discharges of Storm Water Associated With Industrial Activities Excluding Construction Activities (Industrial Permit).¹ This letter constitutes CERF's notice of intent to sue for violations of the Clean Water Act and Industrial Permit for Action Auto's facility located at 151 Reed Ct, Chula Vista, California, 91911 ("Facility"), as set forth in more detail below.

Section 505(b) of the Clean Water Act requires that sixty (60) days prior to the initiation of a citizen's civil lawsuit in Federal District Court under Section 505(a) of the Act, a citizen must give notice of the violations and the intent to sue to the violator, the Administrator of the U.S. Environmental Protection Agency, the Regional Administrator of the U.S. Environmental Protection Agency for the region in which the violations have occurred, the U.S. Attorney General, and the Chief Administrative Officer for the State in which the violations have occurred (33 U.S.C. § 1365(b)(1)(A)). This letter provides notice of Action Auto's Clean Water Act violations and CERF's intent to sue.

I. Coastal Environmental Rights Foundation (CERF)

CERF is a non-profit public benefit corporation organized under the laws of the State of

¹ The Industrial Permit amendments, pursuant to Order No. 2014-0057-DWQ, become effective July 1, 2015. All references are to the Industrial Permit prior to modification pursuant to Order No. 2014-0057-DWQ are to the "Industrial Permit." All references to the Permit as modified by Order No. 2014-0057-DWQ are to the "New Industrial Permit."

California with its main office in Encinitas, CA. CERF is dedicated to the preservation, protection, and defense of the environment, the wildlife, and the natural resources of the California Coast. Members of CERF use and enjoy the waters into which pollutants from Action Auto' ongoing illegal activities are discharged, namely Otay River, San Diego Bay and ultimately the Pacific Ocean.

The public and members of CERF use Otay River, San Diego Bay and the Pacific Ocean to fish, sail, boat, kayak, surf, swim, scuba dive, birdwatch, view wildlife, and to engage in scientific studies. The discharge of pollutants by the Action Auto Facility affects and impairs each of these uses. Thus, the interests of CERF's members have been, are being, and will continue to be adversely affected by Action Auto Owners and/or Operators' failure to comply with the Clean Water Act and the Industrial Permit.

II. Storm Water Pollution and the Industrial Permit

A. Duty to Comply

Under the Clean Water Act, the discharge of any pollutant to a water of the United States is unlawful except in compliance with certain provisions of the Clean Water Act. (See 33 U.S.C. § 1311 (a)). In California, any person who discharges storm water associated with industrial activity must comply with the terms of the Industrial Permit in order to lawfully discharge. Action Auto enrolled as a discharger subject to the New Industrial Permit on June 23, 2015 with WDID No. 9 371004000. Action Auto originally enrolled under the Industrial Permit on September 1, 2005

Pursuant to the Industrial Permit, a facility operator must comply with all conditions of the Industrial Permit. Failure to comply with the Industrial Permit is a Clean Water Act violation. (Industrial Permit, § C.1; New Industrial Permit §XXI.A. ["Permit noncompliance constitutes a violation of the Clean Water Act and the Water Code..."]). Any non-compliance further exposes an owner/operator to an (a) enforcement action; (b) Industrial Permit termination, revocation and re-issuance, or modification; or (c) denial of a Industrial Permit renewal application. (*Id.*). As an enrollee, Action Auto has a duty to comply with the Industrial Permit and is subject to all of the provisions therein.

B. The Action Auto Facility Discharges Contaminated Storm Water in Violation of the Industrial Permit

Discharge Prohibition A(2) of the Industrial Permit and Section III.C. of the New Industrial Permit prohibit storm water discharges and authorized non-storm water discharges which cause or threaten to cause pollution, contamination, or nuisance. Receiving Water Limitation C(1) of the Storm Water Permit prohibits storm water discharges to surface or groundwater that adversely impact human health or the environment. In addition, receiving Water Limitation C(2) prohibits storm water discharges and authorized non-storm water discharges, which cause or contribute to an exceedance of any water quality standards, such as the CTR or applicable Basin Plan water quality standards. (See New Industrial Permit, §III.D.; §VI.A.). "The California Toxics Rule ("CTR"), 40 C.F.R. 131.38, is an applicable water quality standard." (*Baykeeper v. Kramer Metals, Inc.* (C.D.Cal. 2009) 619 F.Supp.2d 914, 926). "In sum, the CTR is a water quality standard in the General Permit, Receiving Water Limitation C(2). A permittee violates Receiving Water Limitation C(2) when it 'causes or contributes to an

exceedance of such a standard, including the CTR." (*Id.* at 927).

If a discharger violates Water Quality Standards, the Industrial Permit and the Clean Water Act require that the discharger implement more stringent controls necessary to meet such Water Quality Standards. (Industrial Permit, Fact Sheet p. viii; New Industrial Permit, §XX.B.1; 33 U.S.C. § 1311(b)(1)(C)). The Action Auto Owners and/or Operators have failed to comply with this requirement, routinely violating Water Quality Standards without implementing BMPs to achieve BAT/BCT or revising the Action Auto SWPPP pursuant to section New Industrial Permit Section XX.B.

The monitoring data for the Action Auto Facility indicates consistent, ongoing exceedances and violations of the Industrial Permit. The Action Auto Owners and/or Operators have discharged and continue to discharge storm water containing pollutants at levels in violation of the above listed prohibitions and limitations during every significant rain event. Action Auto's sampling data reflects numerous discharge violations. Action Auto's own sampling data is not subject to impeachment. (*Baykeeper, supra*, 619 F.Supp. 2d at 927, citing *Sierra Club v. Union Oil Co. of Cal.*, (9th Cir. 1987) 813 F.2d 1480, 1492 ["when a permittee's reports indicate that the permittee has exceeded permit limitations, the permittee may not impeach its own reports by showing sampling error"]).

As reflected below, the Facility has exceeded the CTR, the Basin Plan and benchmarks during every significant rain event monitored in the last few years.

No.	Date	Parameter	Units	Result	Benchmark/ WQO	NAL
1	11/4/11	TSS	mg/L	103	-	100
2	11/4/11	Iron	mg/L	5.08	0.3 ¹	1.0
3	11/4/11	Aluminum	mg/L	3.03	.75 ³	.75
4	11/4/11	Lead	mg/L	.105	.065 ²	.262
5	11/4/11	Specific Conductance	umhos/cm	420	200	-
6	2/28/14	Iron	mg/L	1.24	0.3 ¹	1.0
7	2/28/14	Aluminum	mg/L	1.02	.75 ³	.75
8	2/28/14	Copper	mg/L	.041	.013 ²	.0332
9	2/28/14	Specific Conductance	umhos/cm	276	200	-
10	1/8/2016	Iron	mg/L	1.23	0.3 ¹	1.0
11	1/8/2016	pH	units	6	6.5-8.5 ⁴	6-9
¹ Basin Plan Objective for Otay Hydrologic Unit, Basin Plan Table 3-2						
² California Toxics Rule Limit						
³ EPA Multi Sector General Permit Benchmark, Table 8.M-1						
⁴ Basin Plan Objective, Inland Surface Waters						

Every day Action Auto Owners and/or Operators discharged or continue to discharge polluted storm water in violation of the Discharge Prohibitions and Receiving Water Limitations of the New Industrial Permit is a separate and distinct violation of the Permit and Section 301(a) of the Clean Water Act, 33 U.S.C. §1311(a). The Action Auto Owners and/or Operators are subject to civil penalties for all violations of the Clean Water Act occurring since Action Auto's

enrollment. These violations are ongoing and will continue each day contaminated storm water is discharged in violation of the requirements of the Permit.

C. Inadequate Storm Water Pollution Prevention Plan

One of the main requirements of the Industrial Permit (and New Industrial Permit) is the Storm Water Pollution Prevention Plan (SWPPP). (Industrial Permit §A; New Industrial Permit, Finding I.54, §X). Action Auto has not developed an adequate SWPPP as required by the New Industrial Permit.

The Action Auto SWPPP fails to adequately assess the Facility's potential contribution of additional pollutants to receiving waters. Per section X.G.2.a. of the New Industrial Permit, the Action Auto Owners and/or Operators are required to assess potential onsite industrial pollutant sources. (New Industrial Permit, §X.G.2.a.). Though the SWPPP identifies mercury, copper, and zinc as potential pollutants at the Facility, it fails to require monitoring for these constituents. (New Industrial Permit, §XI.B.6.c.; see SWPPP, p. 30, pp. 13-14). The SWPPP also fails to assess the potential presence of phosphorus² though the EPA Fact Sheet for Sector M identifies phosphorus as a potential pollutant associated with auto salvage yards, SIC Code 5015. (New Industrial Permit, §XI.B.6.c.; see SWPPP, pp. 13-14).

Every day the Action Auto Owners and/or Operators operate the Facility without an adequate SWPPP constitutes a separate and distinct violation of the Industrial Permit, the New Industrial Permit, and Section 301(a) of the Clean Water Act, 33 U.S.C. § 1311(a). The Action Auto Owners and/or Operators have been in daily and continuous violation of the Industrial Permit since at least March 20, 2012. These violations are ongoing and the Action Auto Owners and/or Operators will continue to be in violation every day they fail to address the SWPPP inadequacies. Thus, the Action Auto Owners and/or Operators are liable for civil penalties of up to \$37,500 per day for violations prior to November 2, 2015, and \$51,570 per day of violations occurring after November 2, 2015. (33 U.S.C. §1319(d); 40 CFR 19.4; New Industrial Permit, §XXI.Q.1).

D. Failure to Monitor

The Action Auto Owners and/or Operators have failed to sample as required during the 2016-2017 and 2015-2016, wet seasons, though numerous qualifying events occurred. (See Exhibit A).

Sections B(5) and (7) of the Industrial Permit required dischargers to visually observe and collect samples of storm water discharged from all locations where storm water is discharged. Facility operators, including the Action Auto Owners and/or Operators, were required to collect samples from at least two qualifying storm events each wet season, including one set of samples during the first storm event of the wet season. Required samples were to be collected by Facility operators from all discharge points and during the first hour of the storm water discharge from the Facility.

The New Industrial Permit requires dischargers to take two samples between July 1 and December 31 and two samples between January 1 and June 30. (New Industrial Permit, §XI.B.2). Nonetheless, Action Auto has failed to comply with these requirements. (See 2015-

² https://www.epa.gov/sites/production/files/2015-10/documents/sector_m_autosalvage.pdf

2016 Annual Report, Question 3). Action Auto has also failed to sample the requisite number of qualified storm events for the 2015-2016 year and the first half of the 2016-2017 year.

In addition, Action Auto failed to sample for additional constituents present at the Facility. Action Auto's failure to sample for mercury, copper, zinc, and phosphorus³ – constituents that are likely present at the Facility – constitutes an additional violation of the New Industrial Permit. (New Industrial Permit, §XI.B.6.c.; see SWPPP, pp. 13-14). Notably, copper and zinc were routinely present in Action Auto's discharge when these constituents were sampled. (See Sampling Data, 2/28/2014).

Every day the Action Auto Owners and/or Operators failed to adequately monitor the Facility is a separate and distinct violation of the Industrial Permit, New Industrial Permit, and Section 301(a) of the Clean Water Act, 33 U.S.C. § 1311(a). These violations are ongoing and the Action Auto Owners and/or Operators will continue to be in violation every day they fail to adequately monitor the Facility. The Action Auto Owners and/or Operators are thus subject to penalties in accordance with the Industrial Permit – punishable by a minimum of \$37,500 per day of violations prior to November 2, 2015, and \$51,570 per day of violations occurring after November 2, 2015. (33 U.S.C. §1319(d); 40 CFR 19.4; New Industrial Permit, §XXI.Q.1).

E. Unauthorized Non-Storm Water Discharges

Except as authorized by Section IV of the New Industrial Permit, permittees are prohibited from discharging materials other than storm water (non-storm water discharges) either directly or indirectly to waters of the United States. (New Industrial Permit, §III.B.; IV.A-B).

Information available to CERF indicates that unauthorized non-storm water discharges occur at the Facility due to inadequate BMP development and/or implementation necessary to prevent these discharges. For example, unauthorized non-storm water discharges occur from the Facility's air compressor condensate, irrigation, and washing activities. The Action Auto Owners and/or Operators conduct these activities without BMPs to prevent related non-storm water discharges. Non-storm water discharges from condensate and irrigation without adequate BMPs – including prevention of contact with industrial areas and monthly visual observations – do not constitute authorized non-storm water discharges pursuant to Section IV.A. of the New Industrial Permit.

Further, the San Diego Regional Municipal Separate Storm Sewer System (MS4) Permit Section E.2.a. prohibits the discharge of unauthorized non-storm water as an illicit discharge. Specifically, condensate should be directed to landscaped or other pervious surfaces or the sanitary sewer – not the storm drains. (MS4 Permit, Section E.2.a.(4)(a)). Notably, irrigation and wash water are not authorized non-storm water discharges pursuant to the MS4 Permit.

Action Auto's unauthorized non-storm water discharge violations are ongoing and will continue until the Action Auto Owners and/or Operators develop and implement BMPs that prevent prohibited non-storm water discharges or obtain separate NPDES permit coverage. Each time the Action Auto Owners and/or Operators discharge prohibited non-storm water in violation of Discharge Prohibition III.B. of the Permit is a separate and distinct violation of the Storm Water Permit and section 301(a) of the Clean Water Act, 33 U.S.C. § 1311(a). CERF will

³ https://www.epa.gov/sites/production/files/2015-10/documents/sector_m_autosalvage.pdf

update the number and dates of violations when additional information becomes available. The Action Auto Owners and/or Operators are subject to civil penalties for all violations of the Clean Water Act occurring since March 20, 2012.

F. Falsification of Reports

Section XVI. of the New Industrial Permit requires dischargers to submit Annual Reports by July 15th following each reporting year. The Annual Report must include a completed compliance checklist that indicates whether a discharger has complied with and addressed all applicable requirements of the Permit. (New Industrial Permit, §XVI.B.1.). The Permit contains numerous additional provisions which ensure the accuracy of reported information. For example, Section XXI.J. requires dischargers take samples and measurements that are "representative of the monitored activity." Further, the Legally Responsible Person or Duly Authorized Representative must certify all documents submitted via SMARTS. (New Industrial Permit, §XXI.K.1.). Any person signing, certifying, or submitting such documents does so under penalty of perjury. (New Industrial Permit, §XXI.L.).

Both the New Industrial Permit and the Clean Water Act make it unlawful to falsify reports, punishable by a \$10,000 fine or by imprisonment, or both. (New Industrial Permit, §XXI.N; 33 U.S.C. §1319(c)(1)). In addition to knowing falsification, negligent violation of the Clean Water Act is also punishable through criminal penalties. (33 U.S.C. §1319(c)(1)).

The 2015-2016 Annual Report for the Facility, certified under penalty of perjury by Action Auto President Gerald Fries contains false information. In Attachment 1, as justification for Action Auto's failure to conduct visual observations of all sampling events and sample the required number of qualifying storm events, Mr. Fries stated Action Auto was "unfamiliar with new permit requirements." This is false.

The Facility's March 2016 SWPPP explicitly details the requirement to sample four qualifying storm events per year in numerous locations. (SWPPP, p. 27). Further, Mr. Fries is listed as the PPT leader responsible for sample collection and record keeping. Mr. Fries is also the legally responsible person who approved and certified the SWPPP. (SWPPP, p.27, p. iii). Lastly, Mr. Fries has been the legally responsible party and has verified each of Action Auto's annual reports since Action Auto's enrollment. Therefore, Mr. Fries' claim of ignorance is factually incorrect. It also does not constitute a legal defense for failure to comply with the Permit requirements. (*U.S. v. Weitzenhoff* (9th Cir. 1993) 35 F.3d 1275, 1284 ["criminal sanctions are to be imposed on an individual who knowingly engages in conduct that results in a permit violation, regardless of whether the polluter is cognizant of the requirements or even the existence of the permit"] emphasis added; *U.S. v. Sinskey* (8th Cir. 1997) 119 F.3d 712, 715-16 ["Given this interpretation of the statute, the government was not required to prove that Sinskey knew that his acts violated either the CWA or the NPDES permit, but merely that he was aware of the conduct that resulted in the permit's violation."]).

Therefore, Action Auto and Mr. Fries are in violation of the Permit and Clean Water Act Section 309. Every day the Action Auto Owners and/or Operators fail to submit an accurate Annual Report for the Facility is a separate and distinct violation of the New Industrial Permit and Section 301(a) of the Clean Water Act. (33 U.S.C. § 1311(a)). Action Auto has been in daily and continuous violation of the New Industrial Permit's reporting requirements every day since at least August 22, 2016. These violations are ongoing and the Action Auto Owners and/or

Operators, as well as Mr. Fries, will continue to be in violation every day they fail to revise and submit an accurate 2015-2016 Annual Report.

III. Remedies

Upon expiration of the 60-day period, CERF will file a citizen suit under Section 505(a) of the Clean Water Act for the above-referenced violations. During the 60-day notice period, however, CERF is willing to discuss effective remedies for the violation noted in this letter. If you wish to pursue such discussions in the absence of litigation, it is suggested that you initiate those discussions immediately. If good faith negotiations are not being made, at the close of the 60-day notice period, CERF will move forward expeditiously with litigation.

Action Auto must develop and implement a SWPPP which complies with all elements required in the New Industrial Permit, including the requisite monitoring, and address the consistent, numerous, and ongoing violations at the Facility. Should the Action Auto Owners and/or Operators fail to do so, CERF will file an action against Action Auto for its prior, current, and anticipated violations of the Clean Water Act.

CERF's action will seek all remedies available under the Clean Water Act §1365(a)(d). CERF will seek the maximum penalty available under the law which is \$37,500 per day of violations prior to November 2, 2015, and \$51,570 per day of violations occurring after November 2, 2015. (33 U.S.C. §1319(d); 40 CFR 19.4; New Industrial Permit, §XXI.Q.1). CERF may further seek a court order to prevent Action Auto from discharging pollutants. Lastly, section 505(d) of the Clean Water Act, 33 U.S.C. § 1365(d), permits prevailing parties to recover costs, including attorneys' and experts' fees. CERF will seek to recover all of its costs and fees pursuant to section 505(d).

IV. Conclusion

CERF has retained legal counsel to represent it in this matter. Please direct all communications to Coast Law Group:

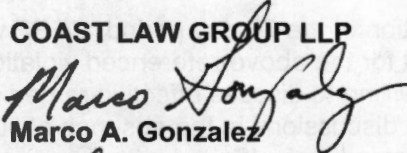
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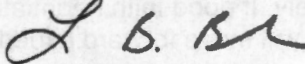
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CERF will entertain settlement discussions during the 60-day notice period. Should you wish to pursue settlement, please contact Coast Law Group LLP at your earliest convenience.

Sincerely,

COAST LAW GROUP LLP


Marco A. Gonzalez



Livia Borak Beaudin

Attorneys for

Coastal Environmental Rights Foundation

CC:

Alexis Strauss Acting Regional Administrator U.S. EPA, Region 9 75 Hawthorne Street San Francisco, CA, 94105	Dave Gibson, Executive Officer Catherine Hagan, Staff Counsel San Diego Regional Water Quality Control Board 2375 Northside Drive, Suite 100 San Diego, CA 92108-2700
Scott Pruitt EPA Administrator William Jefferson Clinton Building 1200 Pennsylvania Avenue N.W. Washington, DC 20004	Thomas Howard Executive Director State Water Resources Control Board P.O. Box 100 Sacramento, CA 95812-0110

EXHIBIT A

STATION	STATION_NAME	ELEVATION	LATITUDE	LONGITUDE	DATE	PRCP
GHCND:USC00041758	CHULA VISTA CA US	17.1	32.64	-117.0858	20150718	0.18
GHCND:USC00041758	CHULA VISTA CA US	17.1	32.64	-117.0858	20150719	0.88
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GHCND:US1CASD0047	CHULA VISTA 3.1SE CA US	61	32.6044	-117.0508	20150720	0.94
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GHCND:US1CASD0047	CHULA VISTA 3.1SE CA US	61	32.6044	-117.0508	20150826	0.1
GHCND:USC00041758	CHULA VISTA CA US	17.1	32.64	-117.0858	20150915	0.1
GHCND:US1CASD0047	CHULA VISTA 3.1SE CA US	61	32.6044	-117.0508	20150916	0.47
GHCND:USC00041758	CHULA VISTA CA US	17.1	32.64	-117.0858	20150916	0.19
GHCND:USC00041758	CHULA VISTA CA US	17.1	32.64	-117.0858	20151004	0.2
GHCND:US1CASD0047	CHULA VISTA 3.1SE CA US	61	32.6044	-117.0508	20151004	0.1
GHCND:USC00041758	CHULA VISTA CA US	17.1	32.64	-117.0858	20151005	0.15
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GHCND:US1CASD0047	CHULA VISTA 3.1SE CA US	61	32.6044	-117.0508	20160201	0.42
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GHCND:USC00041758	CHULA VISTA CA US	17.1	32.64	-117.0858	20160307	0.32

GHCND:US1CASD0047	CHULA VISTA 3.1SE CA US	61	32.6044	-117.0508	20160307	0.14
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GHCND:USC00041758	CHULA VISTA CA US	17.1	32.64	-117.0858	20160312	0.16
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GHCND:USC00041758	CHULA VISTA CA US	17.1	32.64	-117.0858	20160410	0.48
GHCND:US1CASD0047	CHULA VISTA 3.1SE CA US	61	32.6044	-117.0508	20160506	0.8
GHCND:USC00041758	CHULA VISTA CA US	17.1	32.64	-117.0858	20160506	0.48
GHCND:USC00041758	CHULA VISTA CA US	17.1	32.64	-117.0858	20160507	0.15
GHCND:USC00041758	CHULA VISTA CA US	17.1	32.64	-117.0858	20160920	0.31
GHCND:US1CASD0047	CHULA VISTA 3.1SE CA US	61	32.6044	-117.0508	20160921	0.45
GHCND:USC00041758	CHULA VISTA CA US	17.1	32.64	-117.0858	20160921	0.14
GHCND:US1CASD0047	CHULA VISTA 3.1SE CA US	61	32.6044	-117.0508	20161121	0.35
GHCND:USC00041758	CHULA VISTA CA US	17.1	32.64	-117.0858	20161121	0.26
GHCND:US1CASD0047	CHULA VISTA 3.1SE CA US	61	32.6044	-117.0508	20161127	0.33
GHCND:US1CASD0047	CHULA VISTA 3.1SE CA US	61	32.6044	-117.0508	20161128	0.1
GHCND:USC00041758	CHULA VISTA CA US	17.1	32.64	-117.0858	20161216	1.04
GHCND:US1CASD0047	CHULA VISTA 3.1SE CA US	61	32.6044	-117.0508	20161216	0.5
GHCND:US1CASD0047	CHULA VISTA 3.1SE CA US	61	32.6044	-117.0508	20161217	0.27
GHCND:USC00041758	CHULA VISTA CA US	17.1	32.64	-117.0858	20161222	1.73
GHCND:US1CASD0047	CHULA VISTA 3.1SE CA US	61	32.6044	-117.0508	20161222	1.3
GHCND:US1CASD0047	CHULA VISTA 3.1SE CA US	61	32.6044	-117.0508	20161223	0.41
GHCND:USC00041758	CHULA VISTA CA US	17.1	32.64	-117.0858	20161223	0.17
GHCND:USC00041758	CHULA VISTA CA US	17.1	32.64	-117.0858	20161224	0.62
GHCND:US1CASD0047	CHULA VISTA 3.1SE CA US	61	32.6044	-117.0508	20161224	0.61
GHCND:USC00041758	CHULA VISTA CA US	17.1	32.64	-117.0858	20161230	0.17
GHCND:US1CASD0047	CHULA VISTA 3.1SE CA US	61	32.6044	-117.0508	20161231	0.33
GHCND:USC00041758	CHULA VISTA CA US	17.1	32.64	-117.0858	20161231	0.22
GHCND:US1CASD0047	CHULA VISTA 3.1SE CA US	61	32.6044	-117.0508	20170101	0.49
GHCND:USC00041758	CHULA VISTA CA US	17.1	32.64	-117.0858	20170101	0.45
GHCND:USC00041758	CHULA VISTA CA US	17.1	32.64	-117.0858	20170105	0.11
GHCND:US1CASD0047	CHULA VISTA 3.1SE CA US	61	32.6044	-117.0508	20170106	0.16
GHCND:US1CASD0047	CHULA VISTA 3.1SE CA US	61	32.6044	-117.0508	20170113	1.1
GHCND:USC00041758	CHULA VISTA CA US	17.1	32.64	-117.0858	20170113	0.62
GHCND:USC00041758	CHULA VISTA CA US	17.1	32.64	-117.0858	20170119	0.47
GHCND:US1CASD0047	CHULA VISTA 3.1SE CA US	61	32.6044	-117.0508	20170119	0.2
GHCND:USC00041758	CHULA VISTA CA US	17.1	32.64	-117.0858	20170120	1.01
GHCND:US1CASD0047	CHULA VISTA 3.1SE CA US	61	32.6044	-117.0508	20170120	0.45
GHCND:US1CASD0047	CHULA VISTA 3.1SE CA US	61	32.6044	-117.0508	20170121	0.63
GHCND:USC00041758	CHULA VISTA CA US	17.1	32.64	-117.0858	20170121	0.15
GHCND:USC00041758	CHULA VISTA CA US	17.1	32.64	-117.0858	20170123	0.51
GHCND:US1CASD0047	CHULA VISTA 3.1SE CA US	61	32.6044	-117.0508	20170123	0.34
GHCND:US1CASD0047	CHULA VISTA 3.1SE CA US	61	32.6044	-117.0508	20170124	0.68

GHCND:USC00041758	CHULA VISTA CA US	17.1	32.64	-117.0858	20170124	0.18
GHCND:US1CASD0047	CHULA VISTA 3.1SE CA US	61	32.6044	-117.0508	20170125	0.1
GHCND:US1CASD0047	CHULA VISTA 3.1SE CA US	61	32.6044	-117.0508	20170218	1.21
GHCND:US1CASD0047	CHULA VISTA 3.1SE CA US	61	32.6044	-117.0508	20170227	0.5
GHCND:USC00041758	CHULA VISTA CA US	17.1	32.64	-117.0858	20170228	1.62
GHCND:US1CASD0047	CHULA VISTA 3.1SE CA US	61	32.6044	-117.0508	20170228	1.34